

Message

From: Roger Zygmunt [Roger.Zygmunt@entechservice.com]
Sent: 9/19/2018 8:56:34 PM
To: Hambrick, Amy [Hambrick.Amy@epa.gov]
CC: Zygmunt, Roger [Roger.Zygmunt@entechservice.com]
Subject: RE: OOOOa Annual Report Question August 2, 2017 to August 1, 2018.
Attachments: ATT00001.txt

Amy:
Thanks for the clarification.

Roger Zygmunt, P. E.
Senior Environmental Consultant
EnTech Consulting Corp.
21 Waterway Avenue
Suite 300
The Woodlands, TX 77380
Cell Tel: 281-381-8147
Tel: 281-362-2714

Email: roger.zygmunt@entechservice.com
Website: www.entechservice.com



Statement of Confidentiality: This email and any attachments transmitted with it are confidential and intended solely for the use of the individual or entity to which they are addressed. The information contained in this email is highly confidential and may be subject to legally enforceable privileges. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that any disclosure, reliance, copying, distribution, dissemination or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. If you have received this communication in error, please notify EnTech immediately by replying to this email. Please delete all copies of this message and any attachments immediately.

From: Hambrick, Amy <Hambrick.Amy@epa.gov>
Sent: Wednesday, September 19, 2018 10:34 AM
To: Roger.Zygmunt@entechservice.com
Subject: re: OOOOa Annual Report Question August 2, 2017 to August 1, 2018.

Roger,

Short answer: No, the template is still draft.

Long answer:

While the CEDRI template is still considered draft, the reports are required to be submitted- this can be done by submitting it to your delegated authority or through CEDRI. CEDRI is available to accept the 60.5420a(b) and 60.5422a(a) and (b) reports. Because EPA's template on the website you referenced is still considered "draft", the requirement to submit only through CEDRI is not triggered. Once the report is "final" then CEDRI

reporting is mandatory. Hence, in the meantime, the report still must be submitted, but the vehicle to do that is either submit to delegated authority or through CEDRI. Make sense?

So from the reg text, once the [final] form has been available in CEDRI for 90 days, submittal through CEDRI is required. Up to this 90 day marker, submittal can be either CEDRI or the delegated authority. Excerpt from the reg text FYI:

“You must submit reports to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>.) You must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI Web site (<https://www3.epa.gov/ttn/chief/cedri/>). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, you must submit the report to the Administrator at the appropriate address listed in §60.4. Once the form has been available in CEDRI for at least 90 calendar days, you must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted.”

Furthermore, as you may know, after OOOOa was finalized in 2016, EPA received administrative petitions seeking reconsideration of various aspects of the 2016 NSPS. EPA sent letters to petitioners granting reconsideration on April 18, 2017 and on June 5, 2017, EPA issued a *Federal Register* notice granting reconsidering on additional requirements. See proposal here: <https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/proposed-improvements-2016-new-source> . The public will have an opportunity to comment on the template to help make it better. Be sure to stay plugged in and submit your comments.

I hope this helps.

Amy

From: Roger Zygmunt [<mailto:Roger.Zygmunt@entechservice.com>]
Sent: Tuesday, September 18, 2018 5:42 PM
To: Thompson, Lisa <Thompson.Lisa@epa.gov>
Cc: Zygmunt, Roger <Roger.Zygmunt@entechservice.com>
Subject: RE: OOOOa Annual Report Question August 2, 2017 to August 1, 2018.

Lisa:

I see the attached spreadsheet is available for the Subpart OOOOa Annual reports due October 31, 2018.
Is the final CEDRI template available to input the annual report data into CDX?

Roger Zygmunt, P. E.
Senior Environmental Consultant
EnTech Consulting Corp.
21 Waterway Avenue
Suite 300
The Woodlands, TX 77380
Cell Tel: 281-381-8147
Tel: 281-362-2714

Email: roger.zygmunt@entechservice.com

Website: www.entechservice.com



Statement of Confidentiality: This email and any attachments transmitted with it are confidential and intended solely for the use of the individual or entity to which they are addressed. The information contained in this email is highly confidential and may be subject to legally enforceable privileges. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that any disclosure, reliance, copying, distribution, dissemination or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. If you have received this communication in error, please notify EnTech immediately by replying to this email. Please delete all copies of this message and any attachments immediately.